

DRAWING AMENDMENTS

Please amend Figure 1 as shown in the marked drawing attached hereto.

REMARKS

With entry of this amendment, claims 26 and 31 have been cancelled, and claims 35 and 36 have been newly added. As a result, claims 1-25, 27-30, and 32-36 are now pending in this application. Based on the foregoing amendments and following remarks, reconsideration and allowance of this application is respectfully requested.

Drawing Amendments

Figure 1 has been amended to include the reference letters “A”, “C”, “D”, “F”, and “G”, which were inadvertently omitted from Figure 1, as originally presented.

Claim Objections

Claims 1 and 13 stand objected to because “the recitation of ‘the layer’ is not clear to what applicants intend to mean.” Claims 1 and 13 have been amended to clarify that the “layer” refers to a layer of the design circuit.

Claim 20 stands objected to because it refers to a “method” instead of a “system”. Claim 20 has accordingly been amended

Thus, the informalities in claims 1, 13, and 20 have been addressed, and as such, Applicant respectfully requests withdrawal of the objections of claims 1, 13, and 20.

Claim Rejections-35 U.S.C. §102

Claims 1-34 stand rejected under 35 U.S.C. §102(b), as being anticipated by U.S. Patent No. 5,740,068 issued to Liebmann et al. (“Liebmann”). Applicant respectfully traverses this rejection, since Liebmann does not disclose each and every element required by these claims.

Claims 1-24

The Examiner indicated on page 3 of the office action that Liebmann discloses the assignment of features to stripes by virtue of sorting edge projections into buckets. While Applicant believes that a “stripe” cannot be reasonably construed as a “bucket,” in order to expedite the prosecution of the application, Applicant has amended independent claims 1 and 13 to require the features of the layer to be respectively assigned to geographical regions partitioned within the layer. Support for this amendment can be found throughout the specification and drawings, which show and describe the assignment of design features to geographical regions (e.g., stripes) located on the layer. In contrast, Liebmann does not disclose the assignment of the edge projections to respective geographical regions of the circuit layer.

Dependent claims 5 and 17 additionally require design data and context information to be displayed to the user, and an identification of the important attributes from the user to be received. The Examiner refers to col. 4, lines 50-67 and col. 6, lines 1-6 of Liebmann for supporting the Examiner’s conclusion that Liebmann discloses these claim elements. However, these citations simply fail to disclose these claimed display and user input features. If the Examiner believes otherwise, he is respectfully requested to elaborate as to how the citation discloses this feature.

Dependent claims 6 and 18 additionally require the assignment of the feature to be received from the user. The Examiner refers to col. 5, lines 36-55 and col. 5, line 66 to col. 6, line 12 of Liebmann for supporting the Examiner’s conclusion that Liebmann discloses this claim element. However, this citation simply fails to disclose the receipt of an assignment of a feature from the user. If the Examiner believes otherwise, he is respectfully requested to elaborate as to how the citation discloses this feature.

Dependent claims 7, 11, 19, and 23 additionally require the calculation of a writing time for the writing plan. The Examiner refers to col. 8, line 66 to col. 9, line 5 of Liebmann for supporting the Examiner's conclusion that Liebmann discloses this claim element. However, this citation simply fails to disclose the calculation of a writing time. If the Examiner believes otherwise, he is respectfully requested to elaborate as to how the citation discloses this feature.

Dependent claims 8, 12, 20, and 24 additionally require the acceptance or rejection of the writing plan based on the writing time. The Examiner refers to col. 8, line 66 to col. 9, line 5 of Liebmann for supporting the Examiner's conclusion that Liebmann discloses this claim element. However, this citation simply fails to disclose the acceptance or rejection of a writing plan based on the writing time. If the Examiner believes otherwise, he is respectfully requested to elaborate as to how the citation discloses this feature.

Thus, claims 1-24 are not anticipated by Liebmann, and as such, Applicant respectfully requests withdrawal of the rejections of these claims.

#### Claims 25-34

Independent claims 25 and 30 have been amended to require the mask writing process to be adjusted to write each feature with an accuracy commensurate with the importance of the attribute of that feature. In contrast, to the extent that the accuracy of the mask writing process in Liebmann is adjusted, it is not adjusted based on the importance of the attribute of a feature, and such adjustment is certainly not commensurate with the importance of the feature attribute. Rather, Liebmann seeks to maximize the accuracy of the mask writing process by applying a correction factor based on distances to nearest neighbors (see Table 1).

Dependent claims 27 and 32 additionally require the context information that is used to analyze the features of the design layer to include “information for neighboring geometries, electrical intent of the features, timing of the intended circuit, redundant features, and relationships of a given feature to neighboring features. Dependent claims 29 and 34 additionally require the context information that is used to analyze the features of the design layer to include “a reason for locating the feature in a particular place within the design, an intended use of the feature within the design, and electrical requirements of the feature within the design. The Examiner has not pointed to any disclosure in Liebmann that describes these claim elements.

Thus, claims 25-34 are not anticipated by Liebmann, and as such, Applicant respectfully requests withdrawal of the rejections of these claims.

#### New Claims

Applicant submits that newly added claims 35 and 36 are supported by the specification, as originally filed, and are patentable over the prior art of record. In particular, claims 35 and 36 depend from respective claims 1 and 13, and are thus patentable for at least the same reasons as these claims are.

#### Conclusion

Based on the foregoing, it is believed that, with entry of this amendment, all claims are now allowable and a Notice of Allowance is respectfully requested. If the Examiner has any questions or

comments regarding this amendment, the Examiner is respectfully requested to contact the undersigned at (714) 830-0600.

Respectfully submitted,



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